

**LAW OFFICES OF ISAAC NUTOVIC
ATTORNEYS AT LAW
261 MADISON AVENUE
26TH FLOOR
NEW YORK, NEW YORK 10016**

**Telephone (917) 922-7963
E-mail: INutovic@Nutovic.com**

July 11, 2023

VIA EMAIL

Honorable Lisa G. Beckerman
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Rm. 623
New York, NY 10004-1408

Re: Erbo Properties LLC et al (the “Debtors”)
Case No. 23-10210

Dear Judge Beckerman:

I am proposed substitute counsel to the Debtors.

With reference to tomorrow’s hearing on the Debtors’ application for an extension of time I enclose email confirmation that Mr. Klein has deposited in escrow \$5 million in the attorney escrow account of Treff & Lowy PLLC under terms of an escrow agreement, also enclosed.

Sincerely,

/s/Isaac Nutovic
Isaac Nutovic

cc: All Counsel